

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

IN RE: DIGITEK  
PRODUCTS LIABILITY LITIGATION

MDL NO. 1968

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THIS DOCUMENT RELATES TO:  
ALL CASES

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**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

**PLEASE TAKE NOTICE** that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs in the above-entitled action will take the oral videotaped deposition of **PHYLLIS LAMBRIDIS** on **Thursday, June 17, 2010 at 9:00 a.m.** at the **Crowne Plaza Hotel, 690 U.S. Highway 46, Fairfield, NJ 07004**, before a Notary Public authorized to administer oaths for the State of New Jersey. Said deposition will continue from day to day until completed.

The deposition will be recorded by Golkow Technologies, Inc., One Liberty Place, Suite 5150, Philadelphia, Pennsylvania 19103. Notice is also given that this deposition may be recorded by videotape. Plaintiffs reserve the right to use the videotaped deposition at the trial in this matter and in any other evidentiary hearing or proceeding where oral testimony may be admitted into evidence.

The deponent is not a party to this action. Said deponent has been or will be served with a deposition subpoena, by agreement, through the attorney for Actavis, Michael Anderton, Esquire. A **COPY OF THE SUBPOENA TO APPEAR AND TESTIFY AT A DEPOSITION IN A CIVIL CASE IS ATTACHED HERETO AND SERVED HEREWITH.** A list of all parties or attorneys for

parties on whom this Notice of Deposition is being served is shown on the accompanying Certificate of Service.

Respectfully submitted,

On Behalf of the Plaintiffs' Steering Committee

s/FredThompson III

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***Co-Lead and Liaison Counsel***

**EXHIBIT "A"**

**SUBPOENA DUCES TECUM**

Pursuant to the Rule 30(b)(2) of the Federal Rules of Civil Procedure, the witness shall bring the following documents to the deposition:

1. Curriculum vitae; and
2. All documents deponent reviewed in preparation for deposition.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 8, 2010 I filed this Notice and Subpoena electronically and served via e-mail a true and correct copy of the foregoing Notice of Deposition of to:

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By: s/Fred Thompson III

*Plaintiffs' Co-Lead Counsel*